

EXHIBIT “D”

From: [Gonzales, John P.](#)
To: [Matt Capacete](#); [Charles Albright](#); [office user](#)
Cc: [Hatchett, Jahlee J.](#); [James Goslee](#); [Daniel Savage](#)
Subject: RE: Nicholas Barone v. Tracey L. Gordon, et al., Case No.: 2:23-cv-02821
Date: Monday, June 30, 2025 3:20:46 PM
Attachments: [image001.png](#)
[image005.png](#)
[image006.png](#)

I have followed up again with the City to get this information and will provide it to you when received. JPG



John P. Gonzales
Attorney at Law
Co-Chair, Public Entity & Civil Rights Litigation Practice Group
2000 Market Street, Suite 2300, Philadelphia, PA 19103
Direct: (215) 575-2871 | Main: (215) 575-2600 | Fax: (215) 575-0856
[bio](#) | [e-mail](#) | [website](#)

This e-mail transmission and any documents, files or previous e-mail messages attached to it, are confidential and are protected by the attorney-client privilege and/or work product doctrine. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any review, disclosure, copying, dissemination, distribution or use of any of the information contained in, or attached to this e-mail transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify me by forwarding this e-mail to JPGonzales@MDWCG.com, or by telephone at (215) 575-2871 and then delete the message and its attachments from your computer.

From: Matt Capacete <mcapacete@cprlaw.com>
Sent: Monday, June 30, 2025 2:39 PM
To: Gonzales, John P. <JPGonzales@MDWCG.com>; Charles Albright <calbright@cprlaw.com>; office user <office@brservices.com>
Cc: Hatchett, Jahlee J. <JJHatchett@MDWCG.com>; James Goslee <JGoslee@cprlaw.com>; Daniel Savage <dsavage@savage-law.com>
Subject: RE: Nicholas Barone v. Tracey L. Gordon, et al., Case No.: 2:23-cv-02821

WARNING: This email originated outside Marshall Dennehey. BE CAUTIOUS before clicking any link or attachment.

Good Afternoon John,

Please find attached Judge Goldberg's 6/27/25 Order regarding our Motion to Compel – filed December 2, 2024. We still have not received the materials from you related to Nick's pension fund and employment file that were the subject of that motion. Please produce them by July 11, 2025 to avoid further motions.

Matt

Matthew A. Capacete, Esquire



2001 Market Street, Suite 2900
Philadelphia, PA 19103
(215) 567-3500 | (215) 567-6019 (fax)
cprlaw.com

PRIVILEGED ATTORNEY/CLIENT COMMUNICATION AND/OR ATTORNEY WORK PRODUCT. This message and attachments may contain privileged and confidential information. If you are not an intended recipient of this message, any use, distribution or copying is prohibited; please notify Cohen, Placitella & Roth, P.C. immediately at (215) 567-3500 or by email reply; and permanently delete all copies.